

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
SPARTANBURG DIVISION

JANE DOES 1-9, )  
vs. ) CA No.: 7:20-cv-00947  
Plaintiffs, )  
vs. )  
COLLINS MURPHY , SHARON )  
HAMMONDS, BRENDA F. WATKINS, )  
LIMESTONE UNIVERSITY , MG )  
FREESITES, LTD., d/b/a PORNHUB.COM, )  
MG FREESITES II LTD., MINDGEEK )  
S.A.R.L., MINDGEEK USA, INC., MG )  
BILLING LTD., and HAMMY MEDIA LTD. )  
d/b/a XHAMSTER.COM, TRAFFICSTARS )  
LTD., WISEBITS LTD, XHAMSTER IP )  
HOLDINGS LTD, WISEBITS IP LTD., )  
Defendants. )  
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JANE DOE, )  
vs. ) CA No.: 7:21-cv-03193  
Plaintiff, )  
vs. )  
LIMESTONE UNIVERSITY F/K/A )  
LIMESTONE COLLEGE, COLLINS )  
MURPHY, MG FREESITES, LTD., d/b/a )  
PORNHUB.COM, and HAMMY MEDIA, )  
LTD. d/b/a XHAMSTER.COM, )  
Defendants. )

**PLAINTIFFS' MOTION TO RECONVENE RULE 30(b)(6)**  
**DEPOSITION OF DEFENDANT WISEBITS IP, LTD.,**  
**TO COMPEL TESTIMONY, AND TO IMPOSE SANCTIONS**

Pursuant to Fed. R. Civ. Pro. 26, 30, and 37, the above-captioned Plaintiffs move the Court to order the reconvening of the February 21, 2024 Rule 30(b)(6) deposition of Defendant

Wisebits IP, Ltd. [hereinafter Wisebits IP]. Plaintiff's motion is supported by an accompanying Memorandum of Law, one filed on PACER and one submitted for *in camera*<sup>1</sup> review. Wisebits IP improperly designated the entire 30(b)(6) deposition as confidential and has moved to file it under seal. Plaintiff's Memorandum of Law quotes extensively from the deposition and also designates the entire deposition as an exhibit. Out of an abundance of caution, the Memorandum of Law quoting the challenged deposition was not filed on PACER but only submitted *in camera* for review. Upon the denial the Defendant's Motion to Seal, the Plaintiff will file the *in camera* version as a supplement to the docket.

The Plaintiffs further move the Court to compel the designee of Wisebits IP to provide complete answers to all of the questions he refused to answer and to impose sanctions on Wisebits IP in the form of paying for the costs of these motions and the reconvened deposition. As more fully explained in the attached Memorandum of Law, which is hereby incorporated by reference, these motions should be granted because Wisebits IP's Rule 30(b)(6) designee – without any legal justification – simply refused to answer, or claimed he did not know the answer, to approximately 100 questions. Each question fell squarely within one or more categories of the Rule 30(b)(6) Notice, and each question sought information relevant to the *alter ego* doctrine, or the substantive claims.

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<sup>1</sup> The Memorandum of Law submitted for *in camera* review includes the Defendants improperly designated “confidential information” that the Plaintiff seeks to challenge. Thus out of an abundance of caution, and to avoid violating this Court’s July 20, 2021 Confidentiality Order, it was not filed on PACER. However Counsel has filed a modified version of the Memorandum of Law in Support of this Motion on PACER. The modified version still contains the proper deposition cites but removes the actual deposition testimony from the brief. In the event the Court denies the Defendant’s Motion to Seal the Plaintiff will file the *in camera* submission on the docket as a supplement.

For the reasons stated, the Plaintiffs respectfully request the Court to order the reconvening of the Wisebits IP Rule 30(b)(6) deposition; order the deponent to provide full answers to each of the relevant questions he refused to testify about; and to award the Plaintiffs sanctions pursuant to Rule 30 and Rule 37.

Respectfully submitted,

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March 13, 2024  
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